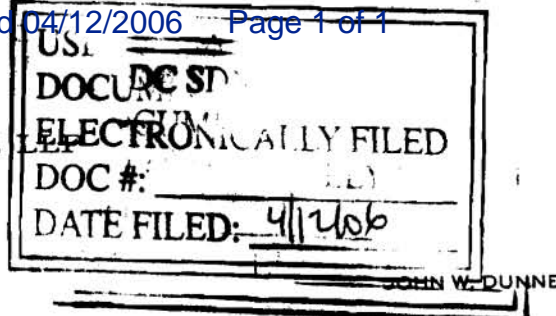


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**MEMO ENDORSED**

April 6, 2006

Hon. Kenneth M. Karas  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: *United States v. Douglas Shyne, et. al.*  
S2 05 Cr. 1067 (KMK)

Dear Judge Karas:

I am the attorney for Naresh Pitambar ("Pitambar"), one of the defendants in the above-referenced indictment. I write to request until April 28, 2006 to file any pre-trial motions. Pitambar was arrested and arraigned on the instant indictment on February 9, 2006, one week after the Court set a date of March 3, 2006 for other co-defendants to file motions. The government has provided discovery on the following dates: February 17<sup>th</sup>, February 26<sup>th</sup>, March 22<sup>nd</sup> and March 26<sup>th</sup>. Accordingly, I need the additional time to review the voluminous discovery and would request until April 28<sup>th</sup> to file motions.

I have spoken to AUSA Danya Perry, and she indicated she has no objection to this request. Thank you for your consideration in this matter.

Respectfully submitted,

  
Denis Kelleher (DK-1414)

Cc: AUSA Danya Perry (via fax# 212-637-2429)

SO ORDERED

  
KENNETH M. KARAS U.S.D.J.  
4/12/06